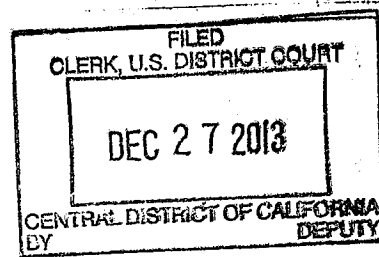


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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
 CENTRAL DISTRICT OF CALIFORNIA

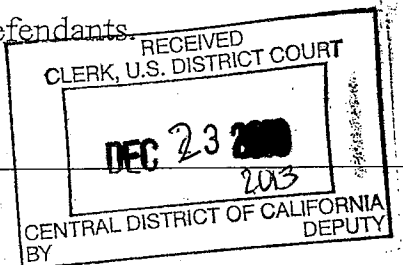
WENDY NOEMI CASTILLO
 TORREZ, on behalf of herself and all
 others similarly situated,

Plaintiff,

VS.

MED-CARE DIABETIC AND
 MEDICAL SUPPLIES, INC., and
 DOES 1 through 10, inclusive, and each
 of them,

Defendants.



Case No. **CV 13-9497 DSF (NPMx)**
CLASS ACTION

COMPLAINT FOR VIOLATIONS
 OF:

1. NEGLIGENT VIOLATIONS
 OF THE TELEPHONE
 CONSUMER PROTECTION
 ACT [47 U.S.C. §227 ET
 SEQ.]
2. WILLFUL VIOLATIONS
 OF THE TELEPHONE
 CONSUMER PROTECTION
 ACT [47 U.S.C. §227 ET
 SEQ.]

DEMAND FOR JURY TRIAL

1 Plaintiff WENDY NOEMI CASTILLO TORREZ ("Plaintiff"), on behalf
2 of herself and all others similarly situated, alleges the following upon information
3 and belief based upon personal knowledge:
4

5 NATURE OF THE CASE

6 1. Plaintiff brings this action for herself and others similarly situated
7 seeking damages and any other available legal or equitable remedies resulting
8 from the illegal actions of MED-CARE DIABETIC AND MEDICAL
9 SUPPLIES, INC., ("Defendant" or "MED-CARE"), in negligently, knowingly,
10 and/or willfully contacting Plaintiff on Plaintiff's cellular telephone in violation
11 of the Telephone Consumer Protection Act, 47 U.S.C. § 227 *et seq.* ("TCPA"),
12 thereby invading Plaintiff's privacy.

13 JURISDICTION & VENUE

14 2. Jurisdiction is proper under 28 U.S.C. § 1332(d)(2) because Plaintiff,
15 a resident of California, seeks relief on behalf of a Class, which will result in at
16 least one class member belonging to a different state than that of Defendant, a
17 company with its principal place of business and State of Incorporation in Florida.
18 Plaintiff also seeks up to \$1,500.00 in damages for each call in violation of the
19 TCPA, which, when aggregated among a proposed class in the thousands,
20 exceeds the \$5,000,000.00 threshold for federal court jurisdiction. Therefore,
21 both diversity jurisdiction and the damages threshold under the Class Action
22 Fairness Act of 2005 ("CAFA") are present, and this Court has jurisdiction.

23 3. Venue is proper in the United States District Court for the Central
24 District of California pursuant to 18 U.S.C. 1391(b) and 18 U.S.C. § 1441(a)
25 because Defendant does business within the state of California and the Central
26 District of California.

27 PARTIES

28 4. Plaintiff, Wendy Noemi Castillo Torrez ("Plaintiff"), is a natural

1 person residing in Phelan, California and is a "person" as defined by 47 U.S.C. §
2 153 (10).

3 5. Defendant, MED-CARE DIABETIC AND MEDICAL SUPPLIES,
4 INC., ("Defendant" or "MED-CARE"), is a company engaged in selling diabetic
5 and medical supplies and is a "person" as defined by 47 U.S.C. § 153 (10).

6 6. The above named Defendant, and its subsidiaries and agents, are
7 collectively referred to as "Defendants." The true names and capacities of the
8 Defendants sued herein as DOE DEFENDANTS 1 through 10, inclusive, are
9 currently unknown to Plaintiff, who therefore sues such Defendants by fictitious
10 names. Each of the Defendants designated herein as a DOE is legally responsible
11 for the unlawful acts alleged herein. Plaintiff will seek leave of Court to amend
12 the Complaint to reflect the true names and capacities of the DOE Defendants
13 when such identities become known.

14 7. Plaintiff is informed and believes that at all relevant times, each and
15 every Defendant was acting as an agent and/or employee of each of the other
16 Defendants and was acting within the course and scope of said agency and/or
17 employment with the full knowledge and consent of each of the other Defendants.
18 Plaintiff is informed and believes that each of the acts and/or omissions
19 complained of herein was made known to, and ratified by, each of the other
20 Defendants.

21 FACTUAL ALLEGATIONS

22 8. Beginning in or around November of 2013, Defendant contacted
23 Plaintiff on her cellular telephone, (562) 446-7258, in an attempt to solicit
24 business.

25 9. Defendant sometimes placed calls multiple days in a row to
26 Plaintiff's cellular telephone in an attempt to solicit business.

27 10. Defendant used an "automatic telephone dialing system", as defined
28 by 47 U.S.C. § 227(a)(1) to place its daily calls to Plaintiff seeking to solicit

1 business.

2 11. Defendant's calls constituted calls that were not for emergency
3 purposes as defined by 47 U.S.C. § 227(b)(1)(A).

4 12. Defendant's calls were placed to telephone number assigned to a
5 cellular telephone service for which Plaintiff incurs a charge for incoming calls
6 pursuant to 47 U.S.C. § 227(b)(1).

7 13. Plaintiff has never provided any personal information, including her
8 cellular telephone number, to Defendant for any purpose whatsoever.

9 14. Accordingly, Defendant never received Plaintiff's "prior express
10 consent" to receive calls using an automatic telephone dialing system or an
11 artificial or prerecorded voice on her cellular telephone pursuant to 47 U.S.C. §
12 227(b)(1)(A).

13 **CLASS ALLEGATIONS**

14 15. Plaintiff brings this action on behalf of herself and all others
15 similarly situated, as a member of the proposed class (hereafter "The Class")
16 defined as follows:

17 All persons within the United States who received any
18 telephone call/s from Defendant or its agent/s and/or
19 employee/s to said person's cellular telephone made
20 through the use of any automatic telephone dialing
21 system or with an artificial or prerecorded voice
22 without express consent within the four years prior to
the filing of the Complaint.

23 16. Plaintiff represents, and is a member of, The Class, consisting of All
24 persons within the United States who received any collection telephone calls from
25 Defendant to said person's cellular telephone made through the use of any
26 automatic telephone dialing system or an artificial or prerecorded voice and such
27 person had not previously not provided their cellular telephone number to
28 Defendant within the four years prior to the filing of this Complaint.

1 17. Defendant, its employees and agents are excluded from The Class.
2 Plaintiff does not know the number of members in The Class, but believes the
3 Class members number in the thousands, if not more. Thus, this matter should be
4 certified as a Class Action to assist in the expeditious litigation of the matter.

5 18. The Class is so numerous that the individual joinder of all of its
6 members is impractical. While the exact number and identities of The Class
7 members are unknown to Plaintiff at this time and can only be ascertained
8 through appropriate discovery, Plaintiff is informed and believes and thereon
9 alleges that The Class includes thousands of members.

10 19. Plaintiff alleges that The Class members may be ascertained by the
11 records maintained by Defendant.

12 20. Plaintiff and members of The Class were harmed by the acts of
13 Defendant in at least the following ways: Defendant illegally contacted Plaintiff
14 and Class members via their cellular telephones thereby causing Plaintiff and
15 Class members to incur certain charges or reduced telephone time for which
16 Plaintiff and Class members had previously paid by having to retrieve or
17 administer messages left by Defendant during those illegal calls, and invading the
18 privacy of said Plaintiff and Class members.

19 21. Common questions of fact and law exist as to all members of The
20 Class which predominate over any questions affecting only individual members
21 of The Class. These common legal and factual questions, which do not vary
22 between Class members, and which may be determined without reference to the
23 individual circumstances of any Class members, include, but are not limited to,
24 the following:

- 25 a. Whether, within the four years prior to the filing of this
26 Complaint, Defendant made any solicitation call (other than a
27 call made for emergency purposes or made with the prior
28 express consent of the called party) to a Class member using

1 any automatic telephone dialing system or any artificial or
2 prerecorded voice to any telephone number assigned to a
3 cellular telephone service;

4 b. Whether Plaintiff and the Class members were damaged
5 thereby, and the extent of damages for such violation; and

6 c. Whether Defendant should be enjoined from engaging in such
7 conduct in the future.

8 22. As a person that received numerous collection calls from Defendant
9 using an automatic telephone dialing system or an artificial or prerecorded voice,
10 without Plaintiff's prior express consent, Plaintiff is asserting claims that are
11 typical of The Class.

12 23. Plaintiff will fairly and adequately protect the interests of the
13 members of The Class. Plaintiff has retained attorneys experienced in the
14 prosecution of class actions.

15 24. A class action is superior to other available methods of fair and
16 efficient adjudication of this controversy, since individual litigation of the claims
17 of all Class members is impracticable. Even if every Class member could afford
18 individual litigation, the court system could not. It would be unduly burdensome
19 to the courts in which individual litigation of numerous issues would proceed.
20 Individualized litigation would also present the potential for varying, inconsistent,
21 or contradictory judgments and would magnify the delay and expense to all
22 parties and to the court system resulting from multiple trials of the same complex
23 factual issues. By contrast, the conduct of this action as a class action presents
24 fewer management difficulties, conserves the resources of the parties and of the
25 court system, and protects the rights of each Class member.

26 25. The prosecution of separate actions by individual Class members
27 would create a risk of adjudications with respect to them that would, as a practical
28 matter, be dispositive of the interests of the other Class members not parties to

1 such adjudications or that would substantially impair or impede the ability of such
2 non-party Class members to protect their interests.

3 26. Defendant has acted or refused to act in respects generally applicable
4 to The Class, thereby making appropriate final and injunctive relief with regard to
5 the members of the California Class as a whole.

6 **FIRST CAUSE OF ACTION**

7 **Negligent Violations of the Telephone Consumer Protection Act**

8 **47 U.S.C. §227 et seq.**

9 27. Plaintiff repeats and incorporates by reference into this cause of
10 action the allegations set forth above at Paragraphs 1-26.

11 28. The foregoing acts and omissions of Defendant constitute numerous
12 and multiple negligent violations of the TCPA, including but not limited to each
13 and every one of the above cited provisions of 47 U.S.C. § 227 et seq.

14 29. As a result of Defendant's negligent violations of 47 U.S.C. § 227 et
15 seq., Plaintiff and the Class Members are entitled an award of \$500.00 in
16 statutory damages, for each and every violation, pursuant to 47 U.S.C. §
17 227(b)(3)(B).

18 30. Plaintiff and the Class members are also entitled to and seek
19 injunctive relief prohibiting such conduct in the future.

20 **SECOND CAUSE OF ACTION**

21 **Knowing and/or Willful Violations of the Telephone Consumer Protection**

22 **Act**

23 **47 U.S.C. §227 et seq.**

24 31. Plaintiff repeats and incorporates by reference into this cause of
25 action the allegations set forth above at Paragraphs 1-30.

26 32. The foregoing acts and omissions of Defendant constitute numerous
27 and multiple knowing and/or willful violations of the TCPA, including but not
28 limited to each and every one of the above cited provisions of 47 U.S.C. § 227 et

1 *seq.*

2 33. As a result of Defendant's knowing and/or willful violations of 47
3 *U.S.C. § 227 et seq.*, Plaintiff and the Class members are entitled an award of
4 \$1,500.00 in statutory damages, for each and every violation, pursuant to 47
5 *U.S.C. § 227(b)(3)(B)* and 47 *U.S.C. § 227(b)(3)(C)*.

6 34. Plaintiff and the Class members are also entitled to and seek
7 injunctive relief prohibiting such conduct in the future.

8 **PRAYER FOR RELIEF**

9 WHEREFORE, Plaintiff requests judgment against Defendant for the following:

10 **FIRST CAUSE OF ACTION**

11 **Negligent Violations of the Telephone Consumer Protection Act**

12 **47 U.S.C. §227 et seq.**

- 13 • As a result of Defendant's negligent violations of 47 *U.S.C.*
14 *§227(b)(1)*, Plaintiff and the Class members are entitled to and
15 request \$500 in statutory damages, for each and every violation,
16 pursuant to 47 *U.S.C. 227(b)(3)(B)*.
17 • Any and all other relief that the Court deems just and proper.

18 **SECOND CAUSE OF ACTION**

19 **Knowing and/or Willful Violations of the Telephone Consumer Protection**
20 **Act**

21 **47 U.S.C. §227 et seq.**

- 22 • As a result of Defendant's willful and/or knowing violations of 47
23 *U.S.C. §227(b)(1)*, Plaintiff and the Class members are entitled to
24 and request treble damages, as provided by statute, up to \$1,500, for
25 each and every violation, pursuant to 47 *U.S.C. §227(b)(3)(B)* and
26 47 *U.S.C. §227(b)(3)(C)*.


27 ///

28 ///

- Any and all other relief that the Court deems just and proper.

Respectfully Submitted this 17th day of December, 2013.

LAW OFFICE OF L. PAUL MANKIN IV

By: /s/ L. PAUL MANKIN IV 
L. Paul Mankin IV
Law Office of L. Paul Mankin IV
Attorney for Plaintiff

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

NOTICE OF ASSIGNMENT TO UNITED STATES JUDGES

This case has been assigned to District Judge _____ Dale S. Fischer _____ and the assigned Magistrate Judge is _____ Michael R. Wilner _____ .

The case number on all documents filed with the Court should read as follows:

2:13CV9497 DSF MRWx

Pursuant to General Order 05-07 of the United States District Court for the Central District of California, the Magistrate Judge has been designated to hear discovery related motions.

All discovery related motions should be noticed on the calendar of the Magistrate Judge.

Clerk, U. S. District Court

December 27, 2013

Date

By J. Prado

Deputy Clerk

NOTICE TO COUNSEL

A copy of this notice must be served with the summons and complaint on all defendants (if a removal action is filed, a copy of this notice must be served on all plaintiffs).

Subsequent documents must be filed at the following location:

☒ Western Division
312 N. Spring Street, G-8
Los Angeles, CA 90012

☐ Southern Division
411 West Fourth St., Ste 1053
Santa Ana, CA 92701

☐ Eastern Division
3470 Twelfth Street, Room 134
Riverside, CA 92501

Failure to file at the proper location will result in your documents being returned to you.

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET

I (a) PLAINTIFFS (Check box if you are representing yourself ☐)
 Wendy Noemi Castillo Torrez, On Behalf of herself and All Others Similarly
 Situated

DEFENDANTS
 Med-Care Diabetic and Medical Supplies, Inc.

(b) Attorneys (Firm Name, Address and Telephone Number. If you are representing yourself, provide same.)

L. Paul Mankin IV, Esq., Law Office of L. Paul Mankin IV

8730 Wilshire Blvd, #310, Beverly Hills, CA 90211

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an X in one box only.)

- ☐ 1 U.S. Government Plaintiff ☒ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES - For Diversity Cases Only
 (Place an X in one box for plaintiff and one for defendant.)

- | | PTF | DEF | | PTF | DEF |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business in this State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business in Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. ORIGIN (Place an X in one box only.)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from another district (specify): ☐ 6 Multi-District Litigation ☐ 7 Appeal to District Judge from Magistrate Judge

V. REQUESTED IN COMPLAINT: JURY DEMAND: ☒ Yes ☐ No (Check "Yes" only if demanded in complaint.)

CLASS ACTION under F.R.C.P. 23: ☒ Yes ☐ No

☐ **MONEY DEMANDED IN COMPLAINT:** \$ 5,000,001.00

VI. CAUSE OF ACTION (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.)
 47 U.S.C. §227, et seq.

VII. NATURE OF SUIT (Place an X in one box only.)

<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc. <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input checked="" type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Act <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Info. Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes	<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Fed. Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury-Med Malpractice <input type="checkbox"/> 365 Personal Injury-Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus-Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 American with Disabilities - Employment <input type="checkbox"/> 446 American with Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	<input type="checkbox"/> 510 Motions to Vacate Sentence Habeas Corpus <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus/Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other	<input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS-Third Party 26 USC 7609
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CV 13-9497

FOR OFFICE USE ONLY: Case Number: _____

AFTER COMPLETING THE FRONT SIDE OF FORM CV-71, COMPLETE THE INFORMATION REQUESTED BELOW.

CIVIL COVER SHEET

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET

VIII(a). IDENTICAL CASES: Has this action been previously filed in this court and dismissed, remanded or closed? ☒ No ☐ Yes
If yes, list case number(s): _____

VIII(b). RELATED CASES: Have any cases been previously filed in this court that are related to the present case? ☒ No ☐ Yes
If yes, list case number(s): _____

Civil cases are deemed related if a previously filed case and the present case:

- (Check all boxes that apply) ☐ A. Arise from the same or closely related transactions, happenings, or events; or
☐ B. Call for determination of the same or substantially related or similar questions of law and fact; or
☐ C. For other reasons would entail substantial duplication of labor if heard by different judges; or
☐ D. Involve the same patent, trademark or copyright, and one of the factors identified above in a, b or c also is present.

IX. VENUE: (When completing the following information, use an additional sheet if necessary.)

(a) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which EACH named plaintiff resides.
☐ Check here if the government, its agencies or employees is a named plaintiff. If this box is checked, go to item (b).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Los Angeles	

(b) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which EACH named defendant resides.
☐ Check here if the government, its agencies or employees is a named defendant. If this box is checked, go to item (c).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Los Angeles	

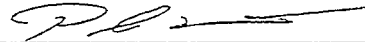
(c) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which EACH claim arose.
 Note: In land condemnation cases, use the location of the tract of land involved.

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Los Angeles	

* Los Angeles, Orange, San Bernardino, Riverside, Ventura, Santa Barbara, or San Luis Obispo Counties

Note: In land condemnation cases, use the location of the tract of land involved

X. SIGNATURE OF ATTORNEY (OR PRO PER):



Date

12/17/13

Notice to Counsel/Parties: The CV-71 (JS-44) Civil Cover Sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law. This form, approved by the Judicial Conference of the United States in September 1974, is required pursuant to Local Rule 3-1 is not filed but is used by the Clerk of the Court for the purpose of statistics, venue and initiating the civil docket sheet. (For more detailed instructions, see separate instructions sheet.)

Key to Statistical codes relating to Social Security Cases:

Nature of Suit Code	Abbreviation	Substantive Statement of Cause of Action
861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1935FF(b))
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969. (30 U.S.C. 923)
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended; plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405(g))
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405(g))
864	SSID	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. (g))